

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL No.
v.)	
)	
)	03-CR-10331 (RGS)
IVAN VELEZ)	
Defendant.)	

UNITED STATES' REQUESTED QUESTIONS FOR THE JURY VENIRE

The United States of America, through its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts and Assistant U.S. Attorneys Cynthia W. Lie and Suzanne M. Sullivan, hereby files this United States Requested Questions for the Jury Venire. The United States hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

(a) ever been arrested, or ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?

(b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?

(c) ever engaged in litigation with the federal

government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?

(d) been employed by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the United States Customs Office, the United States Immigration and Naturalization Service, the United States Internal Revenue Service?

2. Are you aware of any prejudice which you may have against the government which would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

3. Some of the witnesses expected to be called by the United States at trial are Special Agents or employees of or working with the United States Customs Office, Immigration and Naturalization Service, and Internal Revenue Service.

Are you aware of any prejudice that you might have for or against a witness or other individual in this case where that witness or individual is shown to be a law enforcement officer?

4. You will hear evidence about a "cooperating witness," who is a co-defendant who will be testifying pursuant to an agreement with the government. Are you aware of any prejudice which you may have against a "cooperating witness" which would in any way impair your ability to evaluate and judge fairly and impartially the testimony offered by such a cooperating witness?

5. Have you, or anyone in your family or close circle of

friends, ever been treated for an addiction to any narcotic substance?

Dated: January 25, 2006

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Cynthia W. Lie

CYNTHIA W. LIE
SUZANNE M. SULLIVAN
Assistant U.S. Attorneys